

## REMARKS

Applicant appreciates the thorough review and analysis from the Examiner outlining the relevant, relied upon features of the cited references. The Examiner rejected claims 1-3 under the provisions of 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,959,547, issued to Tubel et al. (hereinafter "the Tubel patent" or "Tubel"). The Examiner also rejected claims 4-8 under the provisions of 35 U.S.C. § 103(a) as being obvious over Tubel, either alone or in combination with U.S. Patent No. 6,229,453, issued to Gardner et al., or U.S. Patent No. 6,816,082, issued to Laborde. Applicant respectfully requests reconsideration of the rejections because these references fail to disclose "a communications router coupled with said processing means and said receiving means, for multiplexing said signals from devices of the well tree and said further signals, and for transmitting said multiplexed signals on to said bi-directional link." Reconsideration of the Examiner's rejections is respectfully requested.

Tubel discloses a downhole production well control system that controls a plurality of zones within a single well or within multiple wells. *See* the Tubel patent (Abstract, Summary of the Invention, and Claims). The Tubel system 22 includes a plurality of downhole sensors and control devices (as detailed in Figure 6) in communication with a network 410. *See id.* (Col. 20: ll. 9-15, Figure 9). A server or bus master 400 monitors the network traffic, performs various tasks, and communicates with a control system at the surface 24. The Tubel patent does not disclose controlling devices at the well tree rather than downhole, nor mention multiplexing signals with the bus master 400 or any other device.

The Tubel patent fails to disclose "a communications router coupled with said processing means and said receiving means, for multiplexing said signals from devices of the well tree and said further signals, and for transmitting said multiplexed signals on to said bi-directional link." The Examiner alleged that the Tubel bus master 400 was such a router, but Tubel fails to disclose

that bus master 400 performs any multiplexing functions. Applicant respectfully submits that it is well known in the electrical arts that multiplexing means to combine a plurality of signal inputs (i.e., 1) signals from the devices of the well tree, and 2) further signals associated with the operation of the well) to produce a single output signal or channel, with the signals being combined using time or frequency division. There is nothing in the functions performed by the Tubel bus master 400 that discloses or suggests such multiplexing. Each and every claim limitation must be shown by Tubel in order to reject the claims under the provisions of 35 U.S.C. § 102. *See* MPEP 706.02(j). Because Tubel fails to disclose a "communications router" as defined in claims 1-8, Applicant respectfully submits that Tubel does not anticipate claims 1-3, and that claims 4-8 are also therefore patentable. Applicant respectfully requests that the Examiner remove this rejection.

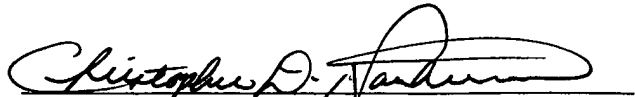
Moreover, the Tubel patent is silent as to controlling "devices of the well tree." The only devices that the Tubel patent discusses are located downhole, instead of on or at the well trees. Accordingly, the Tubel patent fails to disclose both the "processing means for applying control signals to and receiving signals from devices of the well tree," and the "a communications router coupled with said processing means and said receiving means, for multiplexing said signals from devices of the well tree and said further signals, and for transmitting said multiplexed signals on to said bi-directional link" elements of claim 1. Because Tubel fails to disclose these elements of claim 1, Applicant respectfully submits that claims 1-8 are patentable over Tubel and the remaining cited references.

**CONCLUSION**

Applicant respectfully submits that claims 1-8 are all in condition for allowance. Reconsideration of the application and allowance of all claims are respectfully requested, and Applicant respectfully requests the issuance of a Notice of Allowance.

Respectfully submitted,

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